

Item 7. Shropshire Local Plan Partial Review - Preferred Scale and Distribution of Development, Draft consultation response

1. Summary

This paper presents a draft AONB Partnership response to the Council's current consultation on the partial review of the Local Plan.

2. Background

Shropshire Council website states:

The Shropshire Local Plan currently comprises the Core Strategy (adopted 2011) and the Site Allocations and Management of Development (SAMDev) Plan (adopted 2015), together with the adopted Neighbourhood Plans for Much Wenlock and Shifnal. These documents set out proposals for the use of land and policies to guide future development in order to help to deliver sustainable growth in Shropshire for the period up to 2026.

Local Planning Authorities are required to keep under review any matters that may affect the development of its area. Shropshire Council has determined to undertake a Local Plan Review in order to allow the consideration of updated information on development needs within the Country; reflect changes to national policy and our local strategies; to extend the Plan period to 2036; and to provide a plan which will help to support growth and maintain local control over planning decisions during the period to 2036. Maintaining an up to date Local Plan will support local growth by generating certainty for investment in local development and infrastructure through a policy framework that establishes an up to date and objective assessment of development needs and supports sustainable development in Shropshire during the period to 2036.

The overall strategic approach of focusing growth in Shropshire's Strategic Centre; Principal Centres and Key Centres, whilst enabling some controlled development in rural areas to maintain local sustainability, remains the preferred development strategy. Many of the existing policies in the Core Strategy and SAMDev do not need to be amended and will be carried forward as part of the new Plan. The review will therefore focus on key areas of change, including options for the level and distribution of new housing and strategies for employment growth during the period to 2036, together with any amended policies and new site allocations which are needed to demonstrate that these requirements can be delivered. The existing Core Strategy and SAMDev Plan will remain in force until any new Plan is adopted. This is anticipated to occur during 2019-20.

The product of the review will be a new Local Plan document which merges the Core Strategy & SAMDev Plans and contains both strategic policies and more applied policies which primarily inform planning decisions, together with existing (and unimplemented) sites and new site allocations.

We are currently undertaking an eight week Preferred Scale and Distribution of Development Consultation, between 27 October 2017 and 22 December 2017. Thus consultation:

- 1. Sets out the preferred scale of housing and employment development in Shropshire 2016-36;*
- 2. Sets out the preferred distribution of this growth;*
- 3. Identifies housing and employment growth guidelines for the strategic centre and each principal and key centre;*
- 4. Confirms the methodology which Shropshire Council proposes to adopt to identify a settlement hierarchy in Shropshire;*

5. Lists the settlements which form part of this hierarchy, including those that will, in future, be identified as Community Hubs and those that will be maintained as Community Clusters;
6. Proposes draft policies for the management of development within Community Hubs and Community Clusters; and
7. Identifies other development requirements which may need to be addressed as part of the Local Plan Review.

The documents are available at <https://shropshire.gov.uk/get-involved/local-plan-review-preferred-scale-and-distribution-of-development/>.

3. RECOMMENDATION:

The Transition Board is recommended to comment on and endorse the draft response for submission subject to amendments.

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Appendix 1 Draft AONB Partnership response to Shropshire Local Plan Review - Preferred Scale and Distribution of Development

3. Do you agree with the preferred housing requirement proposed for Shropshire of 28,750 dwellings between 2016 and 2036 (1,430 dwellings a year), identified in Section 2 of the Consultation Document?

No.

We have concerns that the 'High' housing numbers chosen were not supported by the majority of respondents in the previous consultation, as raised by others. It would appear that the Council is not fully taking on board the views of local people. However, our comment on this choice is focused on its potential impact on the AONB, to which 'great weight' should be given.

The combination of the county target and the proportion then allocated to Church Stretton will end up determining whether a problematic site in Church Stretton (all potential sites of any scale here are problematic) needs to be developed or not in this period. It turns a 'sliding scale' of numbers into a very 'binary' outcome with significant implications for the AONB. See also response to Q6.

6. If you have any comments on any of the settlement strategies provided within Appendix 3 of the Consultation Document, please use this space to make them:

Development in Church Stretton is very constrained by the physical landscape and high environmental quality around it. This highly unusual landscape setting is however a positive thing - it is the key both to Church Stretton's past and to its future, and should not always be characterised as a limitation. Church Stretton is unique in Shropshire as the only market town in the AONB, and needs to be treated as such. This is not an abstract paper designation, and it is no coincidence that the real physical properties of the landscape around the town show that a very

different approach is needed here. It does not appear to be sound planning once again for the argument to be made that Church Stretton has 'got off lightly' with its allocated housing numbers, if these numbers would result in development which is not compatible with the AONB, which is almost certainly the case. The footnote to para 14 of NPPF indicates that protection of AONBs is not subordinated to housing need, as would be suggested by the Council's proposal. The allocation process must be based on a proper assessment of capacity (policy compliant) of different places to accommodate development, and not just a theoretical numbers exercise. Even if the 'high' numbers are used, as it appears will be the case, the distribution of these could avoid harm to the AONB by significantly lowering the allocated numbers for Church Stretton. A hundred or so more houses could easily be accommodated in the larger towns, where there are better work opportunities. Also some of them could be built in some of the smaller villages in the AONB and elsewhere. People often describe these villages as dying on their feet. The needs of the town are not likely to be met by the provision of further market price housing, which will not have a significant impact on the demographic balance.

A similar argument can be made with regard to employment land in Church Stretton. This sort of site is suited to industrial development, which is less appropriate to Church Stretton than elsewhere. Current units lie vacant indicating a lack of demand and there are physically no sites to accommodate 3 hectares more of employment land. The tourism-based economy of the town certainly needs support, but further industrial land is the wrong sort of help, and is likely to undermine this important sector of the economy. The allocation shows a 'one size fits all' approach, which does not take full account of the strengths and weaknesses of the town.

5. Do you agree with the preferred spatial distribution of the proposed housing and employment requirements, which has an 'urban focus', identified in Section 4 of the Consultation Document?

Yes. Subject to comments elsewhere about the distribution of the key centres allocation. Church Stretton's allocated housing numbers should be reduced.

7. Do you agree with the proposed 'Community Hubs' identified within Table 3 of the Consultation Document?

Hubs in the AONB – Clun, Ditton Priors, Clee Hill

No comment?

8. Do you support the proposed policy for managing development in 'Community Hubs'?

No comment?

9. Do you think any additional 'Community Clusters' to those identified in Table 4 should be formed? Or any of the existing 'Community Clusters' identified in Table 4 removed?

Clusters including villages in the AONB:

Priestweston, Rorrington

Clungunford

Hope, Shelve, Gravels, Bromlow

Snailbeach, Stiperstones

Wentnor, Norbury

Hopton Wafers

Silvington, Bromdon, Wheathill

Aston on Clun, Hopesay

Seifton, Westhope

Stoke St Milborough
Wistanstow
Buildwas

No comment?

10. Do you support the proposed policy for managing development in 'Community Clusters'?

No comment?

11. Do you support the proposed approaches to managing residential and non-residential development in the wider Countryside?

Consultation document states:

Non-Residential Development in the wider Countryside

6.28 To promote a prosperous rural economy, the current policy approach to non-residential development in the Countryside outside Community Hubs and Community Clusters will continue.

6.29 Therefore local policy will supplement national policy in responding to issues such as:

- Allowing small scale, new employment development to diversify the rural economy.*
- Allowing rural businesses the opportunity to grow and diversify their enterprise to include the conversion / replacement of suitably located rural buildings.*
- Ensuring that any development within the countryside is of an appropriate size and scale to its setting and that sufficient infrastructure is available.*
- Supporting sustainable rural tourism.*

No.

The categories of development covered by this section include those most regarded as threats to the quality of the AONB, including large scale poultry sheds and solar farms. The AONB Partnership as the Council's specific adviser regarding the AONB feels that the Council cannot demonstrate that its statutory duty to take the purposes of AONB designation into account has been met without addressing these important issues much more directly. Given the decisions recently made on major developments in the AONB, the text of this section is likely to be seen as an 'anything goes' policy, as there appears to be no size or scale deemed inappropriate, particularly for agricultural development.

The wording of this section should mention the AONB specifically, and more generally refer to maintaining environmental quality as a positive thing. The Council's strategy appears to be mesmerised by the growth drivers to the north and east and fails to recognise that these are not the main factors for the south and west of the county. There is a lack of imagination around the possibilities of environment and heritage-led regeneration in this area, in which the AONB and its qualities are seen as an asset rather than a constraint, and activity which is in harmony with it, is actively promoted. The Economic Growth Strategy final version did pick up on the very strong message from the consultation that the environment and tourism is important, but this does not yet appear to have filtered through enough into planning policy. A lesser echo of the same pattern of industrial growth proposed for the north and east will not only harm the AONB's landscape but is also a huge missed opportunity. Evidence shows that the high quality landscape

and environment of Shropshire is a major factor for the wellbeing of its residents and a major draw to new investment in the tourist industry and associated businesses in the area.

Section 4.12 states *"The approach also reflects the need to achieve a realistic growth strategy, and one which responds appropriately to the presence of environmental constraints, in particular the Shropshire Hills Area of Outstanding Natural Beauty (AONB) to the south of the County."* This is an example of how the AONB and a high quality environment is always portrayed in a negative light in planning documents, and the positive opportunities arising from this are missed. We would welcome working more closely with you, especially through the review of the AONB Management Plan over the next year to address this.

12. Please use the space below to make any further comments on this Consultation:

We note the reference to the Ironbridge power station site and would comment as follows: This site is of high sensitivity, abutting the AONB at the western edge and the Ironbridge World Heritage Site to the east. A form of development which supports environment and heritage-led regeneration is therefore to be preferred here. The layout and design of any proposed development should pay close attention to landform and environmental networks on the site, retaining features of value (e.g. woodland and mature trees), and making use of opportunities from the rolling terrain for some of the development to be relatively unobtrusive. Use should be made of open greenspace and new planting to help screen the development, provide a landscape and biodiversity buffer to the AONB and provide recreational benefits for the new residents. The potential should also be considered for secondary impacts on the AONB from an increased population in close proximity, such as increase in traffic, impacts on tranquillity, change in character from upgrade of roads, increased recreational use, etc. Design should minimise these impacts, and appropriate mitigation put in place. Account should be taken of the AONB Management Plan on these as well as landscape and visual matters. The development should provide some investment in green infrastructure and heritage assets in the area affected. This is a large site, on which some redevelopment within the current built footprint is likely to have relatively little impact on the AONB, and may offer opportunities for improvements in landscape and amenity terms. However, the existing character and topography of the western agricultural part of the site, with north-facing slopes and ridges, would mean development on these areas would have a much greater impact. This would be greatest on the higher slopes and on the land west of the disused railway. A large scale of new development on these currently undeveloped parts of the site would be a surprise to many in the community, and a very likely source of much contention and opposition.

The document states that 'Shropshire needs to grow'. This is misleading and unclear – is it Shropshire's economy or population that needs to grow, or is this a veiled intention to reunite with Telford & Wrekin?

A49 corridor – the A49 cuts through the very centre of the AONB, and the AONB Management Plan highlights the A49 corridor as the least tranquil part of the AONB, with concerns about rising levels of traffic stimulated by growth elsewhere. This will have a negative effect on tourism through affecting precisely the sort of quality people come to the area to experience. The section of A49 within the AONB is relatively short, and tranquillity in the AONB should be valued and taken fully into account. Speed is a major factor in traffic noise and whatever upgrades to the road as a whole may be undertaken, speeds should be kept down on this section.